

## FDD-PST

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**Sent:** Friday, April 28, 2000 1:31 PM  
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**Subject:** BPR

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FD2000 Project Coordinator Food Distribution Division -

FNS

Comments attached.

## **Valdosta City School Nutrition Program**

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April 27, 2000

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Response to sixteen issues presented by USDA.

### **Expand the use of long-term contracts**

This appears to be a good idea, but I am afraid that each state would wind up with a different contract before everyone's needs were taken care of. It would take a very liberal contract to meet the needs of all states. We surely do not need to implement long-term contracting in a manner that would transfer the storage problems to vendors. We need more information to understand the full scope of what is intended in this proposal.

### **Test best-value contracting**

Just how does commercial packaging make vendors more responsible for product liability and food safety concerns?

### **Update product specifications**

Some product specifications could help the program but some could hurt. If we receive ground beef in ten-pound boxes instead of thirty-six pound it could cost the local programs four times as much. Changing product specifications could hurt the program since we have some product specifications that are higher than the average packing standard such as ground beef, where we could wind up with more fat.

### **Allow vendors to use commercial labels**

We absolutely disagree with this. This would be a nightmare in keeping products separate. Bookkeeping would be impossible for managers. Auditors would not know surplus from purchased. USDA should not address commodities as DONATED but as surplus and try to improve the image and promote the high quality of commodities. USDA commodities should be of domestic origin only.

### **Move toward national umbrella contracts with processors**

The concept is good, but we do not believe one contract will fit all.

### **Expand full substitutability of commodity product**

We oppose this change. Allowing substitutability allows inferior products to be purchased and processed to make the products more efficient for the processor.

### **Work with states to test the seamless commodity distribution concept**

There are too many unanswered questions in this proposal and I feel the Georgia State Director of USDA is more qualified to ask questions and supply answers.

### **Facilitate the processing of commodities with limited demand**

Good

**Develop written hold and recall procedures**

Good

**Reduce the duration for product holds at the school level**

Good

**Publish commodity recall reimbursement procedures**

Good

**Provide computer connectivity to the school district level**

I do not believe USDA can accomplish this without some major bucks and exceptional computer techs. You're wishing for the stars.

**Provide a single USDA point of contact**

I thought USDA had a single point of contact in each state. Are you suggesting a single point of contact on national bases? (Get Real) It sounds like a lot of other states need some training on how to operate the food distribution program instead of punishing all states.

**Work with states and partners to pilot-test improvements**

I was unaware of pilots being conducted until recently. Who is evaluating the results and are they going to be published for everyone?

**Other Improvements: Facilitate the use of 4/11 funds for commodity purchases; encourage cooperatives; and relax truckload requirements**

Relaxing truckload requirements is a good idea and would improve the existing FDP system. Would SFA's lose control over product specifications if 4 and 11 funds were used? Cooperatives should be encouraged through the National School Lunch Program not FDP.

**Streamline paperwork and reporting requirements**

Paperwork can not be streamlined until all the other problems are worked out first. From the looks of some of the changes there may be more paperwork.

**I have always been a supporter of the USDA programs and appreciate the efforts you are making. I believe change is good, but you need to meet with the people that actually work with the program on the state and local level and find out what changes need to be made.**

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